

Civil No. 5:18-cv-00017-FL

Defendants.

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**DEFENDANT TRANS UNION LLC’S  
MOTION TO DISMISS PLAINTIFF’S  
COMPLAINT**

COMES NOW, Trans Union LLC (“Trans Union”), and files its Motion to Dismiss Plaintiff’s Complaint pursuant to Rules 12(b)(6). Plaintiff fails to allege facts sufficient to support a claim for relief. Plaintiff repeats the statutory language and merely offers speculative and conclusory allegations that he received a “personal credit report” when he requested a “full consumer file disclosure.” Plaintiff’s allegations do not adequately state a claim and fail to provide Trans Union with adequate notice of the basis of the claims asserted against it. Trans Union’s arguments are more fully set forth in its Memorandum in Support, filed contemporaneously with this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant Trans Union respectfully requests that this Honorable Court dismiss Plaintiff's Complaint pursuant to Rules 12(b)(6) and for such other relief as the Court deems necessary.

Respectfully submitted,

This 19<sup>th</sup> day of February, 2018.

YOUNG MOORE AND HENDERSON, P.A.

BY: /s/ Kelly S. Brown

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***Counsel for Trans Union LLC***

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and served the foregoing document via Certified Mail with the United States Postal Service on the following non-CM/ECF participant:

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